



*United States
Nuclear Regulatory Commission*

NRC'S VIEWS ON DOE'S SITE SUITABILITY PLANS

EXPECTED DOE/NRC INTERFACE

CONCERNS AS A REGULATOR

COMMENTS ON IMPLEMENTATION OF 10 CFR 960

*Malcolm Knapp, Director
Division of Waste Management*



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EXPECTED DOE/NRC INTERFACE

DOE IS RESPONSIBLE FOR SUITABILITY (10 CFR 960).

**NRC WILL FOCUS ON DOE'S LICENSE APPLICATION
DEVELOPMENT (10 CFR 60)**

**NRC IS CONCERNED ABOUT HOW DOE WILL ISSUE PRE-
LICENSING PRODUCTS**

NRC WILL INTERACT WITH DOE AS IT DEVELOPS ITS PLANS.



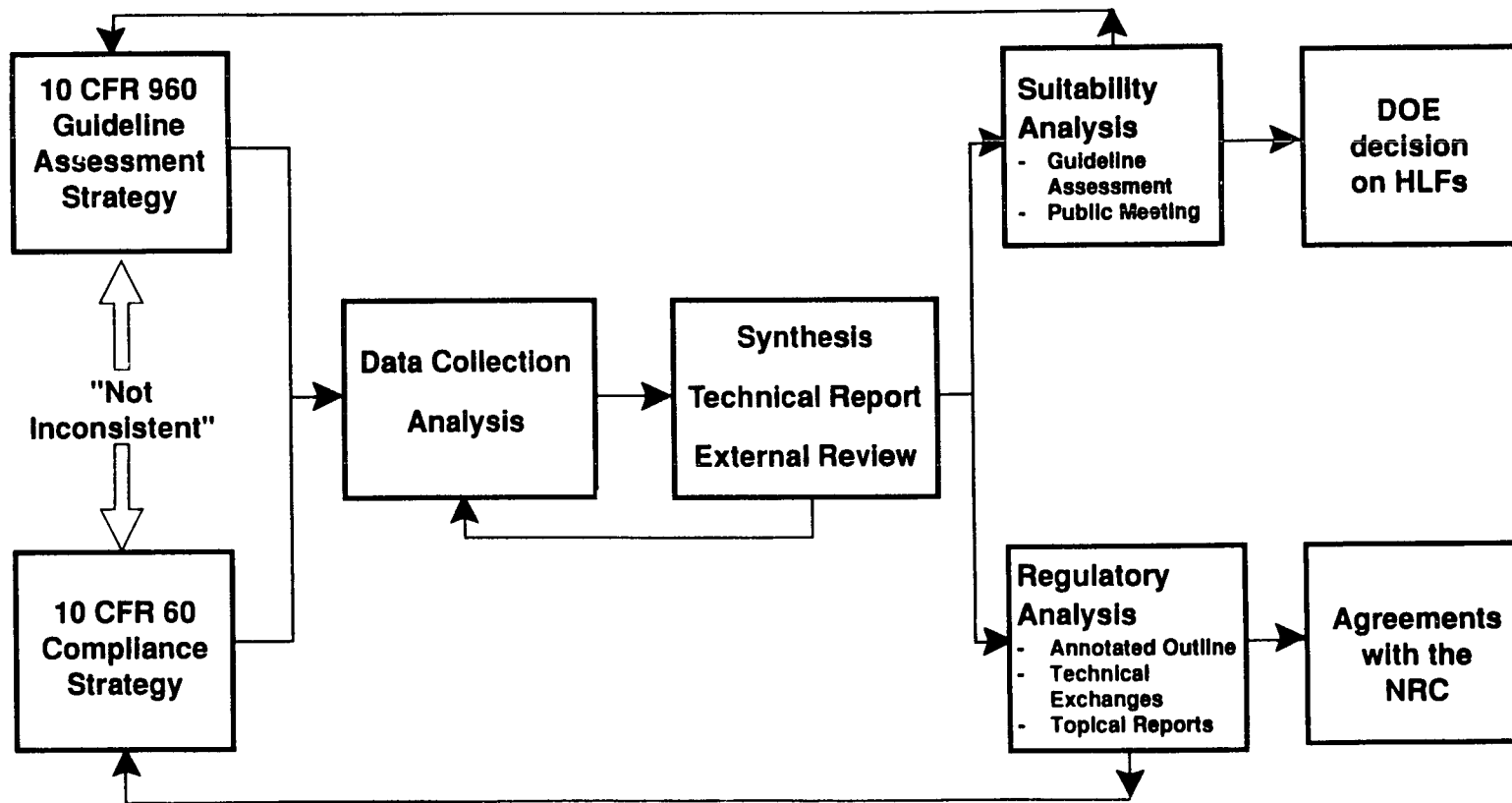
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**DOE'S SITE SUITABILITY DECISIONS
(SEPTEMBER 28, 1994)**

ITEM	FY94	FY95	FY96	FY97	FY98	FY99	2000	2001
	1 2 3 4	1 2 3 4	1 2 3 4	1 2 3 4	1 2 3 4	1 2 3 4	1 2 3 4	1 2 3 4
Surface Processes		◆						
Preclosure Rock Characteristics			◆					
Tectonics				◆				
Reasonably Available Technology				◆				
Geochemistry/Postclosure Rock Characteristics				◆				
Geohydrology/Transport					◆			
Total System Performance Assessment					◆			
Preclosure Radiological Safety				◆				
Technical Site Suitability Evaluation					◆			
License Application								◆

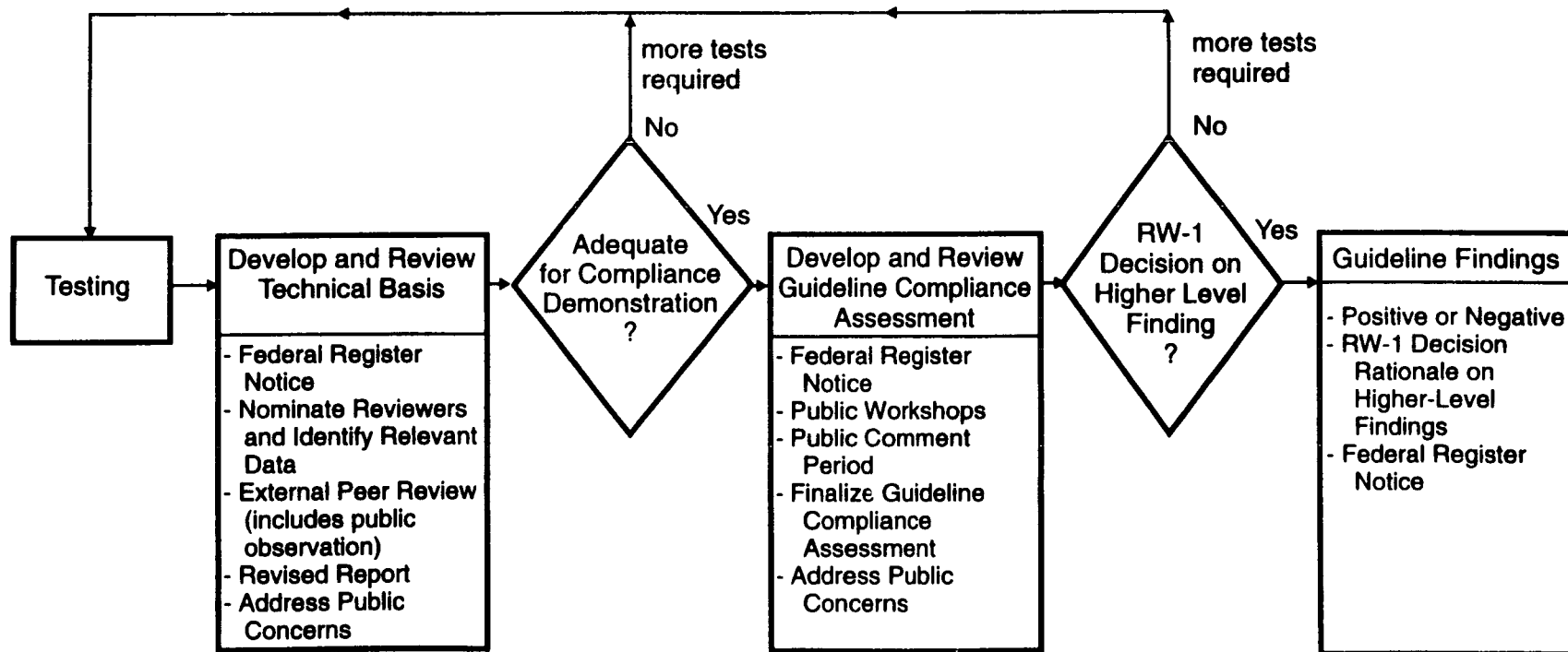


DOE'S CONCEPTUAL MODEL OF SUITABILITY/LICENSING INTERFACE (9/28/94)





DOE'S SITE SUITABILITY EVALUATION PROCESS (9/28/94)





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CONCERNS AS A REGULATOR

**FOCUS ON QUALIFYING AND DISQUALIFYING CONDITIONS MAY
DISTRACT DOE FROM LICENSE APPLICATION ISSUES.**

**EMPHASIS ON MANAGEMENT DECISION PROCESS MAY DISTRACT DOE
FROM ENSURING COMPLETENESS AND QUALITY IN LICENSING
PRODUCTS.**



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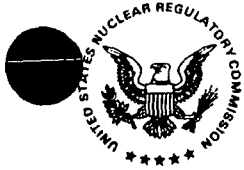
COMMENTS ON IMPLEMENTATION OF 10 CFR 960

**HIGHER LEVEL FINDING DECISIONS MAY NOT MEET
EXPECTATIONS**

TIGHT SCHEDULES MAY LIMIT DATA AND ANALYSES

BOUNDING DECISIONS MAY BE DIFFICULT

HLF FINDINGS MAY NOT BE SEPARABLE



HIGHER LEVEL FINDING - SURFACE PROCESSES

**960.4-2-5 EROSION - POSTCLOSURE QUALIFYING
CONDITION AND DISQUALIFYING CONDITION**

**960.5-2-8 SURFACE CHARACTERISTICS - PRECLOSURE
QUALIFYING CONDITION**

**960.5-2-10 HYDROLOGY - PRECLOSURE QUALIFYING
CONDITION AND DISQUALIFYING CONDITION**



960.4-2-5 EROSION
(Paraphrased)

(A) QUALIFYING CONDITION -

EROSIONAL PROCESSES AT THE SURFACE ARE UNLIKELY TO CAUSE RADIONUCLIDE RELEASES GREATER THAN THOSE ALLOWED UNDER EPA STANDARDS AND NRC REGULATIONS.

(D) DISQUALIFYING CONDITION -

SITE CONDITIONS DO NOT ALLOW THE UNDERGROUND FACILITY TO BE AT LEAST 200 METERS BELOW THE SURFACE.